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5 *Representing the United States of America*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 **-OOO-**

9 **UNITED STATES OF AMERICA,**  
Plaintiff,  
10 **vs.**  
**RAMON DESAGE,**  
aka, "RAMON ABI-RACHED,"  
aka, "RAYMOND ANTOINE ABI-  
RACHED,"

11 **PETER AKARAGIAN, and**  
12 **GARY PARKINSON,**  
Defendants.

13 CASE NO: 2:13-CR-00039-JAD-VCF

14 STIPULATION TO CONTINUE  
TRIAL DISCLOSURE AND  
PRETRIAL MOTION DEADLINES  
(FIRST REQUEST)

15 It is hereby stipulated and agreed, by and between Dayle Elieson, United  
16 States Attorney, through Patrick Burns, Assistant United States Attorney, and  
Richard Wright, Esq. and George Kelesis, Esq., counsel for Defendant Ramon Desage,  
17 and Thomas Pitaro, Esq., counsel for Gary Parkinson, and Anthony Sgro, Esq.,  
counsel for Defendant Peter Akaragian, that the deadline for the Government and  
18 Defendants to file trial briefs, exhibit lists, and witness lists, previously scheduled for  
19 June 14, 2018, be vacated and reset to June 29, 2018, and that the deadline for filing  
any pretrial motions, previously set for June 29, 2018, be vacated and reset to July 9,  
2018.

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22 This Stipulation is entered into for the following reasons:  
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1           1.     Calendar call and trial in this case are currently set for August 6 and  
2     14, 2018, respectively.

3       2. The Court previously ordered the Government and the Defendants to  
4 file their trial briefs, exhibit lists, and witness lists by June 14, 2018. The Court also  
5 scheduled a deadline for motions in limine to be filed by June 29, 2018.

6       3.     Counsel for the Government and Defendants Desage, Parkinson, and  
7 Akaragian are currently engaged in productive negotiations that may resolve the case  
8 without a trial.

9       4. The parties jointly request that the witness, exhibit, and trial brief  
10 deadlines be continued to June 29, 2018, and that the deadline for filing pretrial  
11 motions be continued until July 9, 2018.

12 5. This request is made in good faith and not for purposes of delay.

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1           6. This is the first request for a continuance of the foregoing deadlines.

2 Dated this 14th day of June, 2018

3           DAYLE ELIESON  
4           United States Attorney

5 By: /s/  
6           RICHARD WRIGHT, ESQ.  
7           GEORGE KELESIS, ESQ.  
8           Counsel for Defendant DESAGE

5 By: /s/  
6           PATRICK BURNS  
7           Assistant United States Attorney

8 By: /s/  
9           THOMAS PITARO, ESQ.  
10          Counsel for Defendant PARKINSON

11 By: /s/  
12          ANTHONY SGRO, Esq.  
13          Counsel for Defendant AKARAGIAN

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2                   **UNITED STATES DISTRICT COURT**  
3                   **DISTRICT OF NEVADA**  
4                   **-OOO-**

5                   **UNITED STATES OF AMERICA,**  
6                   **Plaintiff,**  
7                   **vs.**  
8                   **RAMON DESAGE,**  
9                   **aka, "RAMON ABI-RACHED,"**  
10                  **aka, "RAYMOND ANTOINE ABI-**  
11                  **RACHED,"**  
12                  **PETER AKARAGIAN, and**  
13                  **GARY PARKINSON,**  
14                  **Defendants.**

15                  **CASE NO: 2:13-CR-039-JAD-VCF**

16                  **FINDINGS OF FACT AND ORDER**

17                  Based on the pending Stipulation of counsel, and good cause appearing  
18 therefore, the Court finds that:

19                  1.        Calendar call and trial in this case are currently set for August 6 and  
20                  14, 2018, respectively.

21                  2.        The Court previously ordered the Government and the Defendants to  
22                  file their trial briefs, exhibit lists, and witness lists by June 14, 2018. The Court also  
23                  scheduled a deadline for pretrial motions to be filed by June 29, 2018.

24                  3.        Counsel for the Government and Defendants Desage, Parkinson, and  
25                  Akaragian are currently engaged in productive negotiations that may resolve the case  
26 without a trial.

27                  4.        The parties jointly request that the witness, exhibit, and trial brief  
28 deadlines be continued to June 29, 2018, and that the deadline for filing pretrial  
29 motions be continued until July 9, 2018.

5. This is the first request for a continuance of the foregoing deadlines.

For all of the above-stated reasons, the ends of justice would be served best by a continuance of the deadlines.

## ORDER

IT IS FURTHER ORDERED that the deadline for the Government and the Defendants to file any trial briefs, witness lists, and exhibits lists in *United States v. Ramon Desage, et al.*, 2:13-CR-039-JAD-VCF, previously scheduled for June 14, 2018, is vacated and reset to June 29, 2018. The deadline for filing any pretrial motions, previously set for June 29, 2018, is vacated and reset to July 9, 2018.

DATED this 14th day of June, 2018.

By:

JENNIFER A. DOESEY  
United States District Court Judge

## Certificate of Service

I, Patrick Burns, hereby certify that I am an employee of the United States Department of Justice, and that on this day I served a copy of the following:

**STIPULATION TO CONTINUE GOVERNMENT'S TRIAL DISCLOSURES DEADLINE**, upon counsel for all defendants appearing in this matter via the CM/ECF system, by electronically filing said document.

Dated: June 14, 2018

/s/ Patrick Burns  
PATRICK BURNS  
Assistant United States Attorney  
District of Nevada